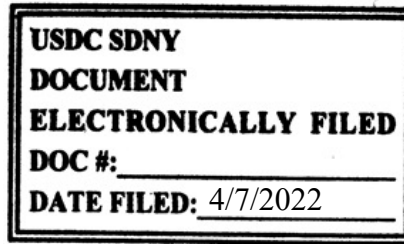


LAW OFFICE OF
JUSTIN A. ZELLER, P.C.

JUSTIN A. ZELLER
JAZELLER@ZELLERLEGAL.COM

JOHN M. GURRIERI
JMGURRIERI@ZELLERLEGAL.COM



TELEPHONE: 212.229.2249
FACSIMILE: 212.229.2246

April 5, 2022

VIA ECF

Hon. Katharine H. Parker, United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse

Re: *Catahan et al v. Eco Community Cleaners Inc. et al*, 20 CV 1749 (AT)

Dear Judge Parker:

This firm represents the plaintiff in the above-referenced action. Plaintiff moves pursuant to Local Civil Rule 37.2 for a conference in anticipation of moving pursuant to Rule 37(a)(3)(B)(iii)–(iv) of the Federal Rules of Civil Procedure for defendants' failure to respond to plaintiff's interrogatories and request for production of documents. Plaintiff's document demands and interrogatories have been separately filed. The parties have conferred and been unable to resolve this issue. The plaintiff called defendants and left a message on March 17, 2022. Then plaintiff emailed defendants regarding this dispute, and defendants stated they would respond to plaintiff's discovery on March 25, 2022, but never did so.

I thank the Court for its time and attention to this matter.

Plaintiff's request for a pre-motion conference is denied. As the parties are scheduled to appear for a settlement conference before the undersigned on April 14, 2022, the parties shall be prepared to discuss the discovery issues raised in the event a settlement is not reached. The parties are reminded that they must exchange settlement demands in advance of the conference.

SO ORDERED:

A handwritten signature in cursive script, reading "Katharine H. Parker".
HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

4/7/2022

Respectfully submitted,

A handwritten signature in cursive script, reading "John M. Gurrieri".

John M. Gurrieri